

JAE HWAN HWANG and
YOUNG HWANG

V.

BUTCHER BOY LIMITED d/b/a)
 BUTCHER BOY, and IGB SYSTEMS LTD.)
 d/b/a BUTCHER BOY, and WILLIAM LASAR III d/b/a)
 BUTCHER BOY, and BUTCHER BOY, and)
 LASAR MANUFACTURING COMPANY, INC.)
 d/b/a BUTCHER BOY, and WESTGLEN)
 CORPORTION d/b/a BUTCHER BOY, and)
 AMERICAN MEAT EQUIPMENT CORP. d/b/a)
 BUTCHER BOY, and AMERICAN MEAT)
 EQUIPMENT LLC d/b/a BUTCHER BOY and,)
 BUTCHER BOY, and SIEMENS-FURNAS)
 CONTROLS, and FURNAS ELECTRIC CO.)

CIVIL ACTION

NO. 209-CV-01178-EL

NOTICE OF REMOVAL
(28 U.S.C. § 1446)

DEFENDANTS AMERICAN MEAT EQUIPMENT CORP. (incorrectly identified as American Meat Equipment Corp. d/b/a Butcher Boy) AND AMERICAN MEAT EQUIPMENT LLC (incorrectly identified as American Meat Equipment LLC, d/b/a Butcher Boy)’s RESPONSE TO THE CROSS CLAIM OF SIEMENS ENERGY & AUTOMATION, INC. (IMPROPERLY SUED AS SIEMENS-FURNAS CONTROLS AND FURNAS ELECTRIC CO.)

1. Answering Defendants hereby incorporate by reference their Answer with Affirmative Defenses and Cross Claims as if the same were fully set forth herein.

2. Denied. This paragraph contains conclusions of law to which no responsive pleading is required. By way of further response, Answering Defendants specifically deny that Plaintiffs' alleged injuries were caused by the averred acts, statements, omissions, negligence, breach of contract, and/or liability producing conduct of Answering Defendants. Strict proof thereof is demanded at time of trial.

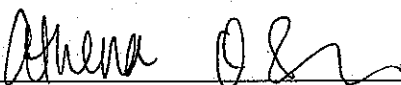
3. Denied. This paragraph contains conclusions of law to which no responsive pleading is required. By way of further response, Answering Defendants deny that they are solely liable, jointly and/or severally liable and/or liable over to Defendant

Siemens Energy & Automation, Inc. (improperly sued as Siemens-Furnas Controls and Furnas Electric Co.), Inc. for contribution and/or indemnity.

WHEREFORE, Defendants American Meat Equipment Corp. (incorrectly identified as American Meat Equipment Corp., d/b/a Butcher Boy) and American Meat Equipment LLC (incorrectly identified as American Meat Equipment LLC., d/b/a Butcher Boy) demand judgment in their favor and against all other parties.

DEASEY, MAHONEY, VALENTINI & NORTH, LTD.

By:


ATHENA O. PAPPAS, ESQUIRE
FRANCIS J. DEASEY, ESQUIRE
Attorneys for Defendants, American Meat
Equipment Corp. (incorrectly identified as
American Meat Equipment Corp, d/b/a Butcher
Boy) and American Meat Equipment LLC
(incorrectly identified as American Meat Equipment
LLC, d/b/a Butcher Boy)

DATED: 10/27/09

CERTIFICATE OF SERVICE

I, Athena O. Pappas, Esquire hereby certify that I have served upon all persons listed below a true and correct copy of the Response to the Cross Claim of Siemens Energy & Automation, Inc. of Defendants, American Meat Equipment Corp., (incorrectly identified as American Meat Equipment Corp, d/b/a Butcher Boy) and American Meat Equipment LLC (incorrectly identified as American Meat Equipment LLC, d/b/a Butcher Boy) in the above-captioned matter this date by ECF and/or First-Class mail, postage prepaid to all parties listed below:

Attorney for Plaintiffs

Christy Adams, Esquire
Adams Renzi Law
1601 Sansom Street, Suite 2C
Philadelphia, PA 19103

Counsel for Defendant, Siemens-Furnas Controls

Kathleen D. Wilkinson, Esquire
The Curtis Center
Suite 1130 East
Philadelphia, PA 19106

Unrepresented Parties:

Butcher Boy Limited d/b/a
Butcher Boy
Lochview Road
Willowyard
Beith
Ayrshire, KA15 1JB
Scotland
United Kingdom

IGB Systems Ltd, d/b/a
Butcher Boy
Lochview Road
Willowyard
Beith
Ayrshire, KA 15 1JB
Scotland
United Kingdom

William Lasar, III, d/b/a
Butcher Boy
Lochview Road
Willowyard
Beith
Ayrshire, KA15 1JB
Scotland
United Kingdom

William Lasar, III
17419 Largs Circle,
Spring, TX 77379

Butcher Boy
Lochview Road
Willowyard
Beith
Ayrshire, KA15 1JB
Scotland
United Kingdom

Lasar Manufacturing Company, Inc., d/b/a
Butcher Boy
2540 East 114th Street
Los Angeles, CA 90059

Westglen Corporation, d/b/a
Butcher Boy
2538 E. 115th Street
Los Angeles, CA 90059

DEASEY, MAHONEY, VALENTINI & NORTH, LTD.

By: /s/ Athena O. Pappas, Esquire
ATHENA O. PAPPAS, ESQUIRE
FRANCIS J. DEASEY, ESQUIRE
Attorneys for Defendants, American Meat Equipment
Corp. (incorrectly identified as American Meat Equipment
Corp., d/b/a Butcher Boy) and American Meat Equipment
LLC (incorrectly identified as American Meat Equipment
LLC, d/b/a Butcher Boy)

Date: October 27, 2009